

**COMMENTS ON THE PETITION FOR RULE-MAKING RM-10868
PROPOSED BY THE SELF-STYLED AMATEUR RADIO FOUNDATION**

Submitted by Mario A. Cuevas

Morse Code Requirement

The Amateur Radio Foundation proposes to keep the Morse code proficiency requirement for the General and Extra classes. However, no clear regulatory purpose is served by privileging one mode of communication over another—i.e., keeping the Morse code requirement even for a single license class.

§ Even a diluted Morse code requirement *obstructs progress* of the radio art and *diminishes the appeal* of the amateur radio service among service- and technically-oriented individuals

Automatic Upgrading of Novices to Technician Class

The Amateur Radio Foundation proposes to automatically upgrade all existing Novices to Technician-level licensees, without passing the Element 2 examination otherwise required for that license level.

§ Automatic upgrading is contrary to one of the purposes of the amateur radio service as stated in 97.1(c) “*Encouragement and improvement of the amateur radio service through rules which provide for advancing skills in both the communications and technical phases of the art.*” The Element 2 examination should be maintained as a requirement for the Technician class.